

COMMENTS BEFORE USDA LISTENING SESSION

ORLANDO, FL

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Carl B. Loop, Jr., President, Florida Farm Bureau Federation

Good afternoon.

I am Carl B. Loop, Jr., president of the Florida Farm Bureau Federation, which has its headquarters in Gainesville. Our total membership is in excess of 150,000 families. There are 61 county Farm Bureaus in Florida. They represent all of Florida's counties. Florida farmers produce more than 280 commercial crops. Our membership reflects this agricultural diversity. Thank you for coming to Florida to hear our comments on this issue.

For more than 25 years, our organization has had formal policy in support of country of origin labeling for agricultural products. Florida Farm Bureau campaigned for adoption of the Country of Origin provisions in the Farm Bill. It passed with strong Congressional support especially within the Florida delegation. USDA is now in the process of implementing it, and implementation is what we are discussing today.

We believe the implementation regulations should be as simple and straightforward as possible. They should be easy for everyone involved to understand. The number one goal should be to ensure the program is not burdensome or excessively costly to producers, processors, retailers or consumers.

The implementation process should not be cause for alarm. Properly implemented, it will benefit the entire food production chain and the consumer as well. Our producers have heard many inaccuracies about the law and its implementation. Some of this was the result of initial studies that significantly overstated what is needed in the system. The estimated costs to implement such complex and often illegal tracking systems (the law specifically prohibits the establishment of an individual animal identification system) sends the wrong message to all involved in the food chain.

We urge USDA-AMS to be considerate of those that are implementing this program. You should strive to have the patience of Job and judgment worthy of Solomon. There is also the need to develop an appreciation and understanding for those entities that truly make the best effort to implement this rule. In this way a partnership can be developed throughout the food chain. By being over zealous and inflexible in the implementation and administration of this rule USDA could create divisiveness and distrust within the food chain where we all have to depend upon one another for our economic success.

We recognize that there are special challenges for the effective implementation of this rule. These challenges not only apply to the rule itself but also include those intangibles such as the politics of personal economics, distaste for any additional regulatory power by the government and those that seek any economic advantage in the marketplace. This industry, given the opportunity, and putting these challenges aside can effectively implement these regulations.

Our Farm Bureau members believe country of origin labeling is important. They see this as an opportunity to build a more personal relationship with the consumers, an opportunity for national promotion, and the potential for market development. Florida producers get very little from the Farm Bill and this provision gives them the hope that they can now develop programs that will help them economically. We will be sending additional comments that will give specific suggestions for the final rule.

It is our belief that a fairly implemented Country of Origin Labeling will benefit the entire U.S. food industry, and help consumers.

I complement USDA for inviting public comment at this Listening Session.